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ABSTRACT

This report evaluates how effectively four federally funded bilingual education block grant programs--Program Development and Implementation Grants, Program Enhancement Projects, Comprehensive School Grants, Systemwide Improvement Grants--used $163 million in fiscal year 2000 to serve children with limited English proficiency (LEP). There are four principle research questions: (1) How similar are the performance goals and measures, eligibility criteria, and allowable services among the four programs? (2) To what extent were the different kinds of grants made to the same types of schools or school districts and how were they used to provide the same services? (3) What is known about the effectiveness of thee programs? and (4) How can these programs be better coordinated and do opportunities exist for program consolidation and cost savings? Results include the following: (1) the four federal programs served similar grantees and funded similar services, but individual schools typically did not receive funding from more than one program; (2) the effectiveness of bilingual programs on a national level is unknown; and (3) consolidation of these programs offers little federal cost savings but may improve efficiency. Overall, it would be possible for a single federal program to address all these needs so long as it had adequate flexibility. Several data-rich tables and figures are provided. (KFT)

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United States General Accounting Office

GAO

Report to the Chairman, Subcommittee on Oversight of Government Management, Restructuring and the District of Columbia, Committee on Governmental Affairs, U.S. Senate

May 2001

ED 455 688

BILINGUAL EDUCATION

Four Overlapping Programs Could Be Consolidated

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Abbreviations

BEA	Bilingual Education Act
CBO	community-based organization
Comprehensive	Comprehensive School Grants
Enhancement	Program Enhancement Projects
IHE	institution of higher education
LEA	local education agency
OBEMLA	Office of Bilingual Education and Minority Languages Affairs
PDI	Program Development and Implementation Grants
Systemwide	Systemwide Improvement Grants

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United States General Accounting Office
Washington, DC 20548

May 14, 2001

The Honorable George V. Voinovich
Chairman, Senate Subcommittee on Oversight of
Government Management, Restructuring
and the District of Columbia
Committee on Governmental Affairs
United States Senate

Dear Mr. Chairman:

In fiscal year 2000, the federal government used $163 million to fund four bilingual education programs—Program Development and Implementation Grants, Program Enhancement Projects, Comprehensive School Grants, and Systemwide Improvement Grants—that award grants to school districts to serve children with limited English proficiency. Past GAO work has highlighted some similarities among the four bilingual education programs.[1] It has also shown that if such programs are designed to achieve similar outcomes for the same target group and are not well coordinated, the potential exists for ineffective service delivery and administrative inefficiencies.

To better understand whether each of these programs plays a unique role in assisting children with limited English proficiency, you asked us to determine (1) how similar the performance goals and measures, eligibility criteria, and allowable services are among the four bilingual education programs; (2) the extent to which the different kinds of grants were made to the same types of schools or school districts and were used to provide the same services; (3) what is known about these programs' effectiveness; and (4) if these programs can be better coordinated or if opportunities exist for program consolidation and cost savings.

To assess the similarities in the performance goals and measures, eligibility criteria, and services among the four bilingual education programs, we reviewed relevant legislation, regulations, and agency documents and interviewed Department of Education (Education) officials. To establish the extent to which grantees receive funding from

[1] *Early Education and Care: Overlap Indicates Need to Assess Crosscutting Programs* (GAO/HEHS-00-78, Apr. 28, 2000).

more than one of the bilingual education programs and what services grantees actually provide, we reviewed a random sample of the files of grantees identified as having received funding from more than one of the four programs in fiscal year 2000.[2] To understand what is known about the programs' effectiveness, we reviewed evaluation literature and interviewed federal staff about the existence of national evaluations of the four bilingual education programs. To explore if opportunities exist for better coordination or program consolidation and cost savings, we interviewed federal program staff about such opportunities and spoke with some grantees who received funding from multiple programs. We conducted our work from October 2000 to April 2001 in accordance with generally accepted government auditing standards.

Results in Brief

All four federal bilingual education programs share the same performance goals and measures, use similar eligibility criteria, and allow for similar uses of program funds. Though their legislative purposes vary, the overall goal of these four programs is to help children with limited English proficiency learn English and meet high academic standards. Local education agencies (LEAs), typically school districts, are eligible to apply for funding under the four bilingual education programs; however, only LEAs with high concentrations of students with limited English proficiency are eligible to apply for grants from the Comprehensive School Grant and Systemwide Improvement Grant programs. Funds from the four programs can be used to provide services in three broad categories: instructional services and materials, professional staff development for teachers and teacher's aides, and family education programs.

In fiscal year 2000, the four bilingual education programs made grants to school districts that shared some characteristics and provided similar services; however, individual schools typically did not receive funding from more than one program. Our review of grantee files indicated that the majority of students served by the four bilingual education programs attended elementary schools and spoke Spanish. Although over 50 percent of grants went to school districts in states with historically high concentrations of students with limited English proficiency, Education has begun to award an increasing number of grants to school districts in states

[2]We reviewed files of approximately 20 percent of the 386 grantees receiving funding from more than one of the four bilingual education programs. This representative sample consisted of grantees receiving funding in fiscal year 2000, regardless of when the grant was awarded.

that until recently had small numbers of such students. The services provided with program funds are similar, but are tailored by school districts and schools to meet local needs.

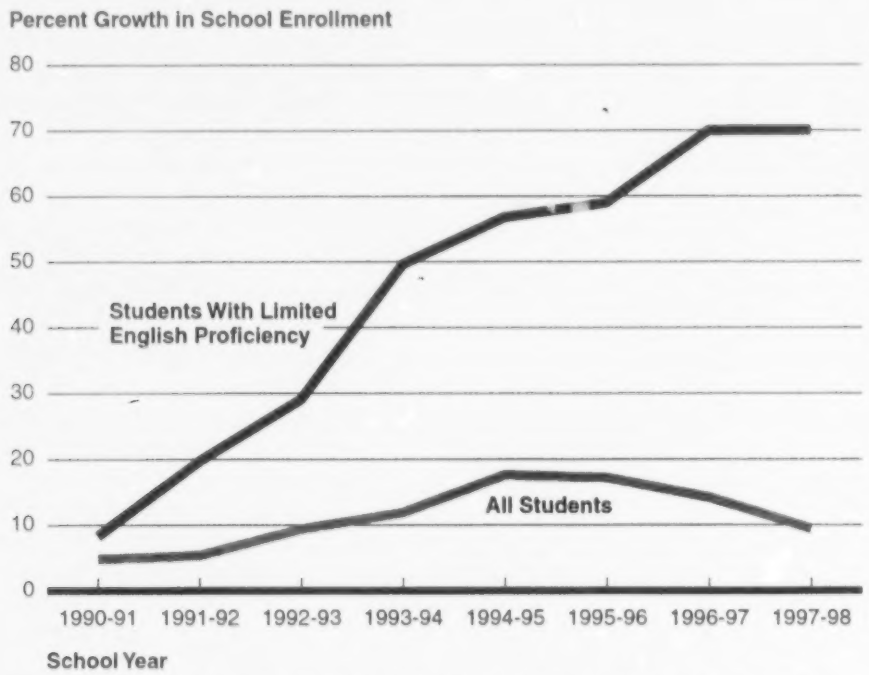
The effectiveness of the four bilingual education programs on a national level is not known. The authorizing legislation requires the use of local evaluations to assess students' progress in meeting state standards. These local evaluations provide important information on the academic achievement of students receiving services from one of the four bilingual education programs compared to their English-proficient counterparts. While the legislation is explicit about the student outcomes to be measured, local programs choose the assessment test to measure the outcomes. The variation in local assessment tests complicates the task of providing a national picture of program effectiveness. Furthermore, many grantees have their own definitions and measures of key terms such as school retention. One study prepared for Education found that it was difficult to aggregate data across programs for these and other reasons, including the variability in the amount and quality of data reported by school districts. Even if Education were able to obtain uniform information about local projects, it faces challenges in trying to isolate the funding effects of the four bilingual education programs from the funding effects of other programs that support students with limited English proficiency.

Because all four bilingual education programs share the same goals, target the same types of children, and provide similar services, these programs lend themselves to consolidation. Education officials acknowledge that opportunities for consolidation exist and have already taken some steps to reduce overlap among the four programs. However, cost savings from consolidation would likely be small for two reasons. First, if the four programs continue to receive a single appropriation, which gives Education the authority to decide which programs to fund at what level, eliminating one or more programs would not necessarily eliminate the dollars associated with them. Second, the same 28 staff members who administer these programs also administer other Education programs and, therefore, eliminating one or more of the bilingual education programs is unlikely to reduce the staff. However, there may be advantages to consolidation, such as allowing more time for staff to perform other important activities like conducting site visits. Consolidation may also benefit grantees directly by reducing the administrative burden associated with redundant federal programs. For these reasons, the Congress may wish to consider consolidating the four bilingual education programs into one program.

Background

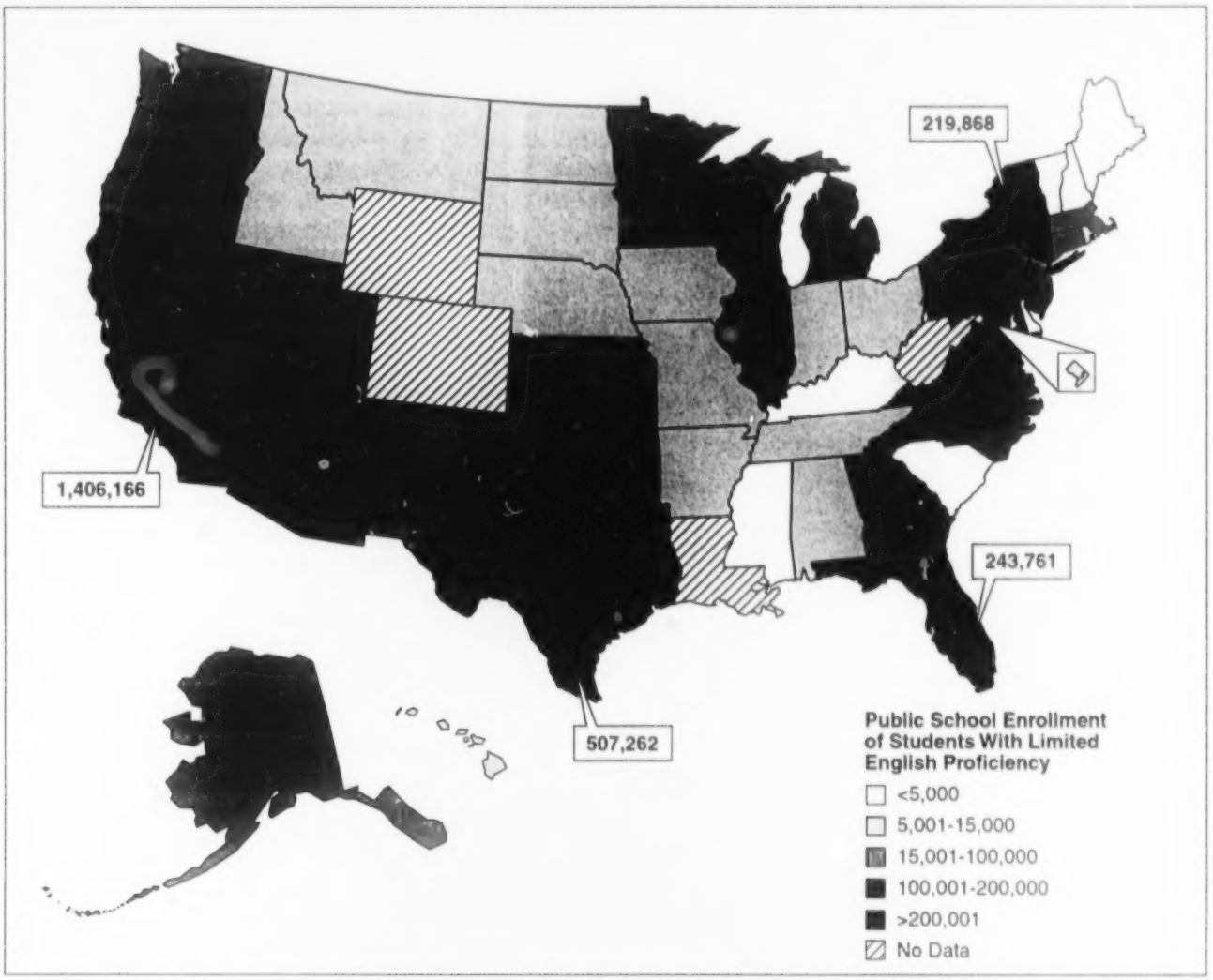
Over the last 2 decades, the number of school-aged children with limited English proficiency in the nation has grown dramatically, increasing from less than 1 million in 1980 to more than 3.5 million in 1998. Despite small rates of growth in the total enrollment of all K-12 children, the enrollment of school-aged children with limited English proficiency across the United States grew exponentially between school years 1989-90 and 1997-98 (see fig. 1). While California, Florida, New York, and Texas continue to have the largest number of children with limited English proficiency (see fig. 2), other states that previously had small populations of such children have experienced large increases in recent years. For example, in Alabama, Idaho, Nebraska, Nevada, North Carolina, and Tennessee, the number of children with limited English proficiency more than doubled between school years 1992-93 and 1997-98 (see fig. 3).

Figure 1: Percent Growth in School Enrollment of Students With Limited English Proficiency Compared to All Students in the United States, 1990-98 (Relative to School Year 1989-90)



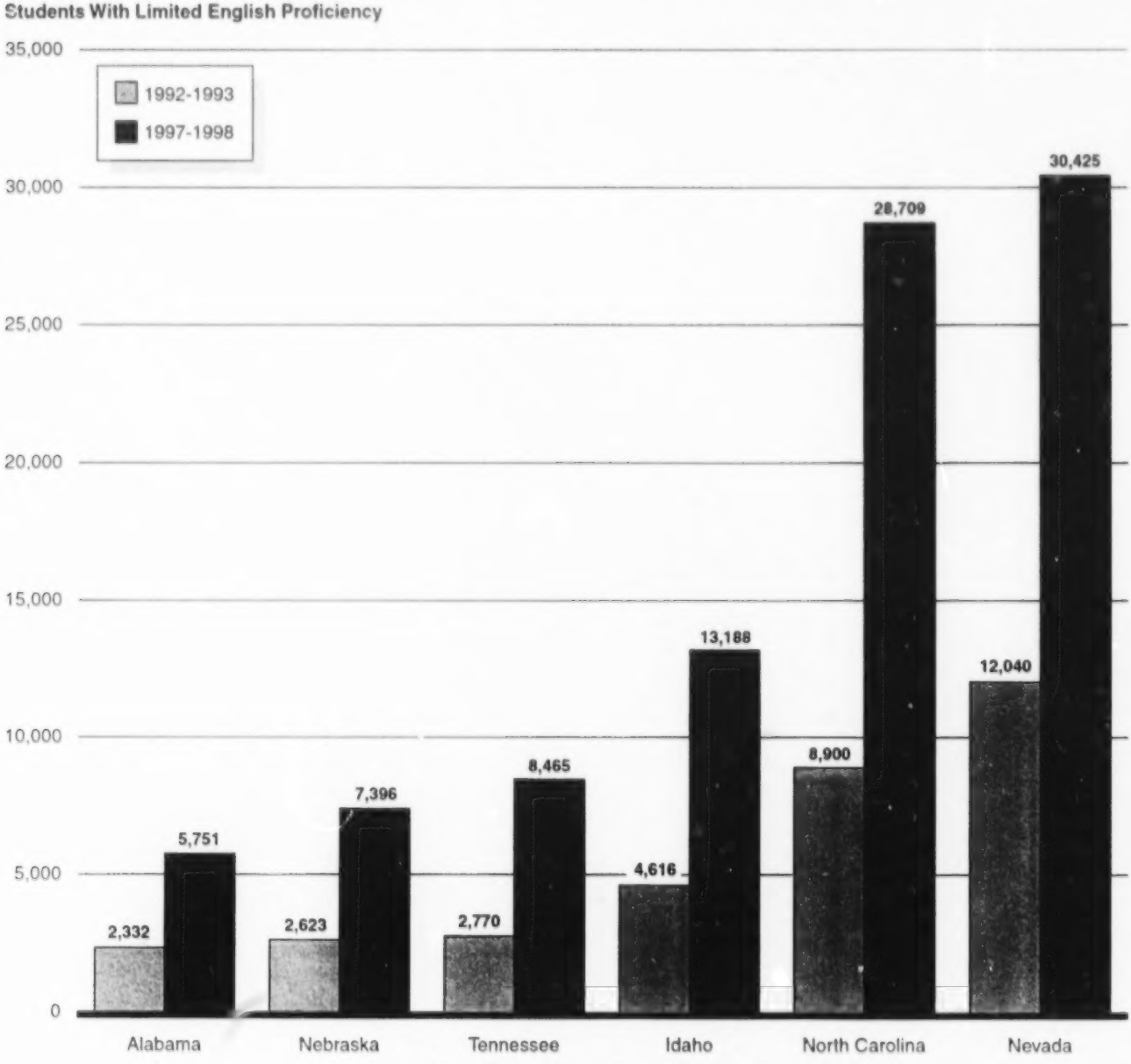
Source: Department of Education and 1997-98 data from the National Clearinghouse for Bilingual Education.

Figure 2: Concentration of Students With Limited English Proficiency in the United States, School Year 1997-98



Source: Data from the National Clearinghouse for Bilingual Education, 1997-98.

Figure 3: Number of Students With Limited English Proficiency Enrolled in Public Schools More Than Doubled in Six States Between School Years 1992-93 and 1997-98



Source: Data from the National Clearinghouse for Bilingual Education.

Historical Context

In 1968, the Congress passed the Bilingual Education Act (BEA). The purpose of the BEA is to educate students with limited English proficiency so that they can reach the academic standards expected of all students. The 1994 reauthorization of BEA[3] created the four bilingual education grant programs—Program Development and Implementation Grants (PDI), Program Enhancement Projects (Enhancement), Comprehensive School Grants (Comprehensive), and Systemwide Improvement Grants (Systemwide)—to distribute funds directly to school districts serving children with limited English proficiency.[4] These are the only federal programs that specifically target instructional services to children with limited English proficiency.

In addition to the four federally funded bilingual education programs authorized by the BEA, other federal programs also address the special needs of these children though they do not exclusively target this population. For example, Title I of the Elementary and Secondary Education Act, which gave $8.7 billion in fiscal year 2000 to assist school districts educating disadvantaged students, is the largest federal program that includes support for children with limited English proficiency.[5] However, most services for children with limited English proficiency are funded with local and state—not federal—dollars.

Program Administration and the Grant Competition Process

Education's Office of Bilingual Education and Minority Languages Affairs (OBEMLA) administers the four competitive bilingual education grant programs. The cost of administering these programs is funded through Education's program administration account, while funding for the program grants is included in OBEMLA's program budget. The bilingual education programs do not receive separate appropriations from the Congress; rather, OBEMLA receives a single budget appropriation to fund

[3]BEA has been amended several times, most recently in 1994 by the Improving America's Schools Act (P.L. 103-382).

[4]Part A of the Bilingual Education Act is divided into three subparts: Instructional Services (Subpart 1), Support Services (Subpart 2), and Professional Development (Subpart 3). The four bilingual education programs discussed in this report are included in Part A, Subpart 1.

[5]See *Public Education: Meeting the Needs of Students With Limited English Proficiency* (GAO-01-226, Feb. 23, 2001). According to *State ESEA Title I Participation Information for 1996-97 Summary Report* (Washington, D.C.: Department of Education, Jan. 2000), 17 percent of Title I participants were classified as students with limited English proficiency.

programs authorized by the BEA. (See app. I for a listing of all programs funded by the single budget appropriation.)

During the grant competition cycle (approximately 4 to 6 months long), application forms are reviewed and scored based on applicants' responses to the selection criteria (see app. II).[6] The applications for the four programs are very similar and are organized into two main sections. The first section requests such information as a proposed summary budget, a detailed itemization of proposed annual expenses, and student data including the language groups and number of both limited English and English-proficient students to be served. The second section, the bulk of the application, is a narrative in which applicants describe the proposed project by demonstrating how it meets the selection criteria established by Education. Although the application forms and the selection criteria for all four programs are very similar, school districts and schools use the application to describe projects tailored to their specific local needs. School districts may submit applications to receive funding from more than one of the programs.

At the end of the grant competition cycle, Education ranks the applications and awards funding to grantees. OBEMLA's management plan contains safeguards to prevent individual schools from receiving funding from more than one bilingual education program. In fiscal year 2000, Education funded approximately 28 percent of the 665 applications it received. According to OBEMLA staff, the following number of grants were awarded in fiscal year 2000 to school districts to serve children with limited English proficiency: 18 Systemwide grants averaging $551,000 each; 75 Comprehensive grants averaging $245,300 each; and 92 PDI grants averaging $156,200 each. No Enhancement grants were awarded in fiscal year 2000. In coming years, Education plans to award a greater proportion of the grants to schools in the early stages of developing and implementing new programs.

Legislative and Presidential Proposals

Congressional interest in the BEA has centered on the appropriate federal role in meeting the special needs of children with limited English proficiency. The 107th Congress is considering several bills as it

[6]Each program has its own peer review process in which individuals, largely from outside the federal government, review and score applications. See *Education Discretionary Grants: Awards Process Could Benefit From Additional Improvements* (GAO/HEHS-00-55, Mar. 30, 2000) for a more detailed description of the peer review process.

deliberates BEA reauthorization in fiscal year 2001. One bill recommends the elimination of the four grant programs and another seeks to significantly increase funding for bilingual education programs and consolidate the four programs into a single grant program. The President's budget proposes to implement changes in bilingual and immigrant education that would consolidate all currently funded bilingual and immigrant programs, as well as the Foreign Language Assistance program, into a single flexible performance-based state grant program.

The Four Bilingual Education Programs Are Similar in Many Important Respects

All four federal bilingual education programs share the same performance goals and measures, possess similar eligibility criteria, and allow similar uses of program funds (see table 1). The four programs target students with limited English proficiency in kindergarten through 12th grade.[7] The overall objectives of these four programs are to provide bilingual or special alternative education programs to children with limited English proficiency and to help such children reach high academic standards. Under each program, students' achievement is measured biannually to determine if they have demonstrated continuous progress in oral and written English, as well as in language arts, reading, and math.

LEAs are eligible to apply for funding under the four bilingual education programs; however, only LEAs with high concentrations of such students are eligible to apply for grants from the Comprehensive and Systemwide programs. LEAs may collaborate on their grant applications with institutions of higher education, community-based organizations, and state education agencies. All four programs also permit the use of funds to provide instructional services and materials, professional staff development for teachers and teacher's aides, and family education programs. The PDI and Enhancement programs require specific uses of funds; the Comprehensive and Systemwide programs permit funds to be used on services from any of the above broad categories. Only the Systemwide program specifically authorizes services at the school district level, such as those associated with grade promotion and graduation requirements. All school districts and schools receiving funds must coordinate with other relevant programs and services to meet the full range of needs of participating students.

[7]The PDI and Enhancement grant programs also serve prekindergarten students.

The legislative purpose and grant length of the four bilingual education programs also vary. For example, PDI grants are to be used to develop and implement new bilingual education programs. According to Education officials, school districts typically submit applications to the PDI program if the population they intend to serve is new to a community and the students are relatively close in age. The purpose of the Enhancement program, according to the legislation, is to expand existing bilingual education programs. In practice, however, differences between the PDI and Enhancement programs have not been apparent to grantees. Education officials said that the types of programs described in the applications submitted by some school districts are the same for both the PDI and Enhancement programs. School districts typically submit applications to the Comprehensive program if the students they intend to serve are concentrated in one school but are disbursed throughout several grades. School districts typically submit applications to the Systemwide program if students with limited English proficiency of all ages attend schools throughout the district. Both the PDI and Enhancement programs make what are considered short-term grants because they provide funding for 2 to 3 years. Both the Comprehensive and the Systemwide program grants provide funding for 5 years.

Table 1: Overview of the Four Bilingual Education Programs

	PDI	Enhancement	Comprehensive	Systemwide
Objectives	To provide bilingual or special alternative education programs to children and youth with limited English proficiency; to help such children and youth develop proficiency in English and, to the extent possible, their native language and meet the same challenging state content standards expected of all children and youth			
Performance goals	Improve oral or written English proficiency and academic achievement in language arts, reading, and math of students served by the BEA Build capacity of schools and school districts to serve students with limited English proficiency Provide grantees with effective guidance and technical assistance and identify and disseminate reliable information on effective practices Improve the quality and quantity of educational personnel serving children with limited English proficiency			
Target population	Students with limited English proficiency			
Eligible entities	LEA LEA in collaboration with an institution of higher education (IHE), community-based organization (CBO), or state education agency An IHE or CBO which has an application approved by the LEA	LEA LEA in collaboration with an IHE, CBO, or state education agency An IHE or CBO which has an application approved by the LEA	LEA LEA in collaboration with an IHE, CBO, or state education agency	LEA LEA in collaboration with an IHE, CBO, or state education agency
Uses of funds	**Required** Develop and implement comprehensive preschool, elementary, or secondary programs coordinated with other relevant programs and services Provide training to teachers, administrators, and other personnel to improve instruction and assessment	**Required** Provide training to teachers, administrators, and other personnel to improve instruction and assessment	**None required**	**None required**
	May include Improving the instructional program for children with limited English proficiency Compensating personnel who are being or have been trained to provide services to children with limited English proficiency	**May include** Improving the instructional program for children with limited English proficiency Compensating personnel who are being or have been trained to provide services to children with limited English proficiency	**May include** Improving the instructional program for children with limited English proficiency Compensating personnel who are either being trained or have been trained to provide services to children with limited English proficiency	**May include** Reviewing, restructuring, and upgrading the instructional program for children with limited English proficiency

	PDI	Enhancement	Comprehensive	Systemwide
	Implementing family education programs	Implementing family education programs	Implementing family education programs	Reviewing, restructuring, and upgrading family education programs Developing student grade promotion and graduation requirements Reviewing, restructuring, and upgrading student assignment policies and practices Reviewing, restructuring, and upgrading personnel policies and practices (for example, recruitment and certification)
Program purpose (as specified in statute)	To develop and implement new bilingual education or special alternative instructional programs	To carry out projects to expand or enhance bilingual education or special alternative instruction	To implement programs to reform, restructure, and upgrade instruction to students with limited English proficiency in schools with significant concentrations of these students	To implement, improve, reform, and upgrade bilingual education programs within school districts with significant concentrations of students with limited English proficiency
Length of grant	3 years	2 years	5 years	5 years

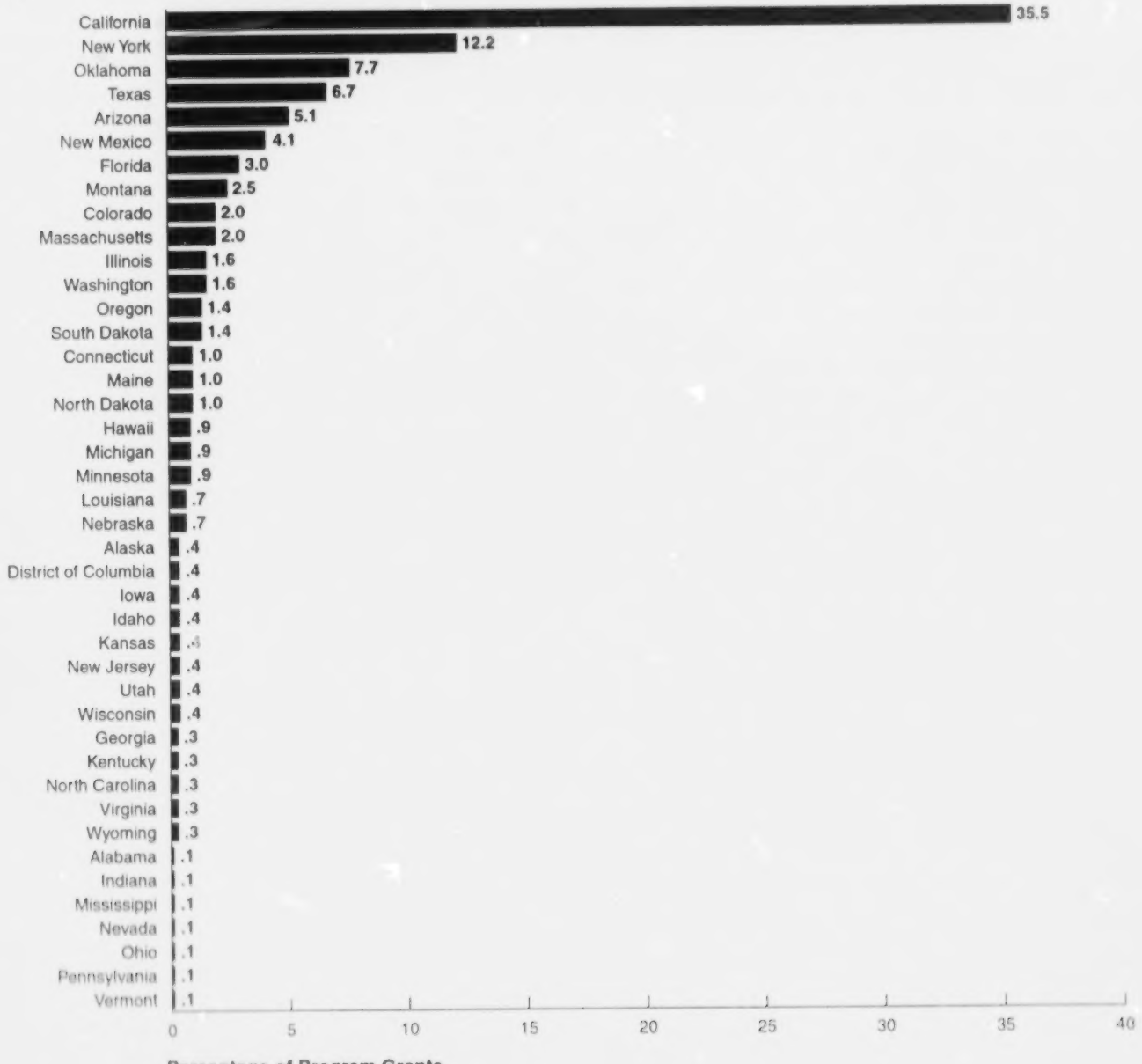
Source: Center for the Education and Study of Diverse Populations, Education's Fiscal Year 2001 Performance Plan, and P.L. 103-382.

The Four Programs Served Similar Grantees and Funded Comparable Services, but Individual Schools Typically Did Not Receive Funding From More Than One Program

OBEMLA officials awarded grants to school districts with similar characteristics that provided similar services; however, individual schools typically did not receive funding from more than one bilingual education program. Our review of grantee files confirmed Education officials' estimate that 80 percent of grants funded projects in elementary schools, and approximately 70 percent of the children served by the programs spoke Spanish as their primary language.[8] A majority of grants funded in fiscal year 2000 went to school districts in states with historically high concentrations of students with limited English proficiency (see fig. 4). However, according to agency officials, Education has begun to award an increasing number of grants to school districts in states that until recently had small numbers of such students.

[8]An estimated 200 other languages are spoken by the remaining students.

Figure 4: Distribution of Bilingual Education Program Grants to States, Fiscal Year 2000



Source: GAO analysis of Department of Education database.

According to Education officials, grantees receiving funding under each of the four programs provided similar services to their students with limited English proficiency. The services provided with program funds fell within three broad categories: instructional activities and materials, professional staff development for teachers and teacher's aides, and family education programs. However, the precise nature of the services varied by district and school. For instance, some school districts chose an English-based instructional approach to teaching students with limited English proficiency, while others made more extensive use of the students' native language (bilingual approach).

Although schools receiving funds were similar in many respects, according to our file review, there is little evidence to indicate that individual schools received funding from more than one bilingual education program (see table 2). Even in instances where school districts received multiple grants, they were distributed so that individual schools typically did not receive funding from more than one program. On the basis of our file review and discussions with grantees and Education officials, we learned that while large school districts located in New York City and Los Angeles County were among the proportion (18 percent) of school districts receiving funding from more than one bilingual education program, individual grants were targeted to different schools within these large districts.[9]

Table 2: Most School Districts Received Funding From Only One Bilingual Education Program in Fiscal Year 2000

Number of grant programs providing funding	Number of school districts	Percentage of school districts receiving funding
1 grant program	360	82
2 grant programs	54	12
3 grant programs	24	5.5
4 grant programs	2	0.5
Total	**440**	**100**

Note: Percentages include all grants funded in fiscal year 2000, regardless of when the grants were awarded.

Source: GAO analysis of Department of Education database

[9]School districts receiving more than one bilingual education program grant may have received funding from multiple programs of the same type (for example, several Comprehensive grants) or of different types (for example, several Comprehensive grants, a PDI grant, and a Systemwide grant).

Effectiveness of Bilingual Programs on National Level is Unknown

The effectiveness of the four bilingual education programs on a national level is unknown because locally collected data are not comparable. The BEA requires local assessments of student outcomes, and leaves the choice of assessment tests to the local program. Although the legislation does not address how these evaluations are to be funded, grantees are required to submit evaluations every 2 years and can—according to Education officials—use grant funds for that purpose. Grantees use these evaluations to improve the local program, further define local program goals and objectives, and measure student outcomes such as academic achievement. To measure student academic achievement, the legislation specifies that local projects provide data on whether students with limited English proficiency are achieving state performance standards. For example, grantees must provide data comparing the academic achievement and school retention rates of students with limited English proficiency with those of English-proficient students. The legislation also requires data on program implementation and the relationship between activities funded by these programs and those funded by other sources.

Because school districts use different assessment tests and define terms differently, student outcome data are not comparable among grantees, or nationally. While the BEA does not require grantees to use specific assessment tests, individual states or school districts may have such requirements. Grantees measure student academic achievement against different performance standards depending on, for instance, whether the standards were set at the state level or by a school district. Furthermore, many grantees have their own definitions and measures of key terms such as school retention. Education's guidance states that because of the variation in how school retention is defined and measured, it is important that each local program follow its own school, district, or state definition and measure. One study prepared for Education found that it was difficult to aggregate data to provide a national picture of program effectiveness for these reasons, and also because of the variability in the quality and amount of data reported by school districts.[10] However, Education may be able to garner some information about how well local bilingual education programs are meeting program goals by comparing local data with Education's performance standards.

[10] *Overview: Summary of Title VII Biennial Evaluation Reports for FY1995-FY1997 Projects* (Rio Rancho, N.Mex.: Center for the Education and Study of Diverse Populations, New Mexico Highlands University, 2000).

Even if Education were able to obtain uniform data across local programs, it would still be difficult to isolate the effects of BEA funding. As mentioned earlier, funding from other federal programs—the largest of which is Title I—also supports these children. Moreover, state and local funds support most of the services provided to students with limited English proficiency. Because services provided to students with limited English proficiency are funded through multiple federal, state, and local sources, it would be difficult to isolate the effects of the four bilingual education program funds from other funding effects.[11]

Consolidation of Bilingual Education Programs Offers Little Federal Cost Savings but May Improve Efficiency

Because all four bilingual education programs share the same goals, target the same types of children, and provide similar services, these programs lend themselves to consolidation. Though federal cost savings would likely be small, program consolidation would allow Education to redirect some of the resources it uses to manage four separate grant competitions to accomplish other activities, such as conducting site visits, reviewing and evaluating specific aspects of a grantee's activities, and providing technical assistance. Program consolidation may also reduce applicant burden associated with multiple federal programs designed to achieve the same overall objectives.

Education officials believe that consolidating these programs has merit and have already taken some steps to reduce overlap among the four programs. For example, because of similarities between the PDI and Enhancement programs cited by grantees and OBEMLA staff, Education holds grant competitions for these programs on alternating years (except in fiscal year 1999) (see table 3). Although reducing the number of programs for students with limited English proficiency requires congressional action, Education already decides which of the four programs to fund in a particular fiscal year and at what level to fund them. Given the inefficiencies associated with program overlap, the Congress may want to consider consolidating the four bilingual education programs into one program.

[11]See *Grant Programs: Design Features Shape Flexibility, Accountability, and Performance Information* (GAO/GGD-98-137, June 22, 1998) for a more detailed discussion of the difficulties associated with isolating the effects of a single program when a target population receives services funded at more than one level of government.

Table 3: Schedule of Grant Competitions for the Four Bilingual Education Programs

	Years that grant competitions were held					
Grant program	1995	1996	1997	1998	1999	2000
PDI		X		X	X	X
Enhancement	X		X		X	
Comprehensive	X	X	X	X	X	X
Systemwide	X		X		X	X

Source: GAO analysis of Education's grantee database.

Federal Cost Savings From Program Consolidation Would Likely Be Small

While opportunities exist for consolidating the four bilingual education programs, federal cost savings, if any, from this action would likely be small for two reasons. First, the way programs are funded may limit any savings. As part of its annual budget request, Education proposes a funding level (as a single line item) for the four bilingual education programs. Because congressional appropriations are made as a single line item for the four programs, Education has the discretion to decide how to distribute the appropriated funds to the individual programs. Therefore, eliminating one or more of the programs would not necessarily change the funding level, which is proposed by Education's budget request and determined by the Congress. Second, staff reductions are unlikely, thus limiting cost savings. Because the same 28 staff members administer all of OBEMLA's programs (the four bilingual education programs we examined as well as 10 others), staff reductions could affect the management of all OBEMLA programs.

Education's Staff Resources Could Be Redirected as a Result of Program Consolidation

Consolidating the four bilingual education programs may provide benefits other than cost savings to Education. According to OBEMLA officials, a reduction in the number of applications received—and possibly the number of grant competitions held—would allow staff to reallocate some of their time to other important program-related activities. Currently, OBEMLA holds a grant competition lasting approximately 4 to 6 months for each of the bilingual education programs awarded in a given year. According to OBEMLA staff, approximately 10 grant competitions are held for the bilingual education and other OBEMLA programs each year. This process consumes significant staff resources. OBEMLA officials also mentioned that some school districts submit grant applications to more than one bilingual education program in an effort to increase their chances of receiving funding from at least one, but OBEMLA does not maintain data on how widespread this practice is. According to Education officials, reducing the number of programs would likely decrease the number of grant applications received because school districts would be less likely to

submit multiple grant applications. As a result, OBEMLA staff would spend less time reviewing applications and, possibly, less time conducting grant competitions.

OBEMLA staff stated that, by spending less time reviewing applications and conducting grant competitions, they would have more time to effectively conduct other important activities such as visiting every grantee at least once during the course of its funding cycle, reviewing and evaluating specific aspects of a grantee's activities, and providing technical assistance. Furthermore, as part of its efforts to provide technical assistance, Education officials might have more time to identify and disseminate information on effective practices gathered from grantees that have been successful in meeting program goals. Education officials also believe that time saved as a result of consolidation may allow for a greater emphasis on building collaborations between grantees and the other programs providing support to children with limited English proficiency.

Program Consolidation May Also Reduce Administrative Burden Experienced by Applicants

Consolidation may also directly benefit grantees applying to more than one of the bilingual education programs by reducing the burden associated with applying to multiple federal programs designed to achieve the same overall objectives. Several grantees we interviewed said that the application process was time consuming. According to the Office of Management and Budget, each application takes from 80 hours (PDI and Enhancement applications) to 120 hours (Comprehensive and Systemwide applications) to complete. Grantees we spoke with estimated that they spent anywhere from 6 days to 6 weeks completing applications. Furthermore, according to Education officials, grantee applications submitted to the PDI and Enhancement programs often proposed using the grants to fund the same types of activities. Given that applications for funding from the four bilingual education programs we reviewed require extensive time and effort to prepare, reducing the number of programs may decrease the administrative burden experienced by school districts applying for multiple program grants.

Education Officials Believe the Four Programs Address Two Priorities

OBEMLA staff believes that the four bilingual education programs meet two funding priorities for students with limited English proficiency. The first priority is to help school districts and schools that have experience serving students with limited English proficiency, and the second is to help those with little experience serving such students. At present, the Comprehensive and Systemwide programs focus on the first priority by meeting the needs of grantees that are upgrading existing programs, and

the PDI and Enhancement programs meet the second priority by awarding grants to educate new populations of limited English-proficient students.

Education officials recognize that four bilingual education programs are not necessary to meet the needs of school districts serving students with limited English proficiency. Education has taken steps to reduce redundancy by not awarding new grants under all four programs every year. During the 6-year period between 1995 (when the programs were first funded) and 2000, Education held grant competitions for all four bilingual education programs in only 1 year.[12] Staff members acknowledged that given enough flexibility to meet a variety of funding priorities, they may be able to serve all grantees with one program.

Conclusions

The four federal bilingual education programs included in this review overlap in many significant ways, and our current and past work has shown that overlap can create an environment in which programs do not serve participants as efficiently as possible. Education officials and some grantees recognize that fewer than four programs could meet the needs of schools educating students with limited English proficiency. We believe it would be possible for a single federal program to address the agency's funding priorities if the program has adequate flexibility.

Matter for Congressional Consideration

To decrease the overlap caused by four bilingual education programs that were designed to achieve the same overall objectives, the Congress may want to consider program consolidation. The Congress could authorize a single federal program that consolidates all four bilingual education programs into one but provides Education with the flexibility to meet the varied needs of school districts serving students with limited English proficiency. Such a program would focus on grantees with experience educating students with limited English proficiency as well as those grantees with little experience in this area.

[12]In 1995, 1997, and 2000, Education held competitions for three of the four programs; in 1996 and 1998, Education held competitions for only two of the programs.

Agency Comments

We provided a draft of this report to the Department of Education for comment and we received written comments, which are included in appendix III. Since the discussions we had with program staff during our review, Education has decided that it supports consolidating the four programs into one, which is consistent with the President's budget proposal. Thus, we have revised the report to reflect Education's position, which also supports the consolidation of the four programs suggested in our Matter for Congressional Consideration. However, our review did not address whether the federal government or states should administer the program, and Education officials did not discuss this topic with us during our review.

In addition, we received technical comments from Education and incorporated these comments where appropriate.

We are sending copies of this report to the Honorable Roderick R. Paige, Secretary of Education; relevant congressional committees; and other interested parties. We will also make copies available to others on request.

Please contact me on (202) 512-7215 if you or your staff have any questions about this report. Other GAO contacts and staff acknowledgments are listed in appendix IV.

Sincerely yours,

Marnie S. Shaul

Marnie S. Shaul
Director, Education, Workforce,
and Income Security Issues

Appendix I: Bilingual Education Programs Funded With a Single Budget Appropriation

- Program Development and Implementation Grants (PDI)
- Program Enhancement Projects (Enhancement)
- Comprehensive School Grants (Comprehensive)
- Systemwide Improvement Grants (Systemwide)
- Academic Excellence Projects
- Career Ladder Program
- Emergency Immigrant Education Program
- Foreign Language Assistance Program (P.L. 103-382, Sec. 7203)
- Graduate Fellowship Program
- National Clearinghouse for Bilingual Education
- Research Grants and Contracts
- State Educational Agency Grants
- Teachers and Personnel Grants
- Training for All Teachers Program

Appendix II: Selection Criteria for the Bilingual Education Programs

During grant competitions, a group of peer reviewers rates applications for each of the four bilingual education programs using the following selection criteria. These criteria help reviewers assess the strength of individual applications. Reviewers assign numerical scores and rank the applications to determine those that merit grant awards. The selection criteria are similar across all four programs.

Selection criterion	PDI	Enhancement	Comprehensive	Systemwide
Meeting purpose of statute			*	
Extent of need for project	*	*	*	*
Quality of project design	*	*	*[a]	*[a]
Quality of project services	*	*		
Proficiency in English and another language	*	*	*	*
Language skills of personnel			*	*
Project activities			*	
Quality of project personnel	*	*	*	
Adequacy of resources	*[b]	*	*[b]	*
Quality of management plan	*[c]	*	*[c]	*
Integration of project funds			*	
Quality of project evaluation plan	*	*	*	*
Commitment and capacity building			*	*[d]

Source: Federal Register Notices (PDI, Sep.1, 2000; Enhancement, Jan. 4, 1999; Comprehensive, Sep.1, 2000; Systemwide, Feb. 8, 2000).

[a]The Comprehensive program shares three of the six project design-related selection criteria with the PDI and Enhancement programs. The criteria for the Systemwide program, although ordered differently, are very similar.

[b]The PDI and Enhancement programs share the same four criteria for evaluating the adequacy of resources. The Comprehensive program criteria are the same as the Systemwide program criteria, but include only two of the four PDI and Enhancement program criteria.

[c]The PDI and Enhancement programs specify the same three criteria for evaluating the adequacy of resources. The Comprehensive program criteria are the same as the Systemwide program criteria, but include only two of the four PDI and Enhancement program criteria.

[d]Criteria for the Systemwide program require that students with limited English proficiency who are disabled be served in accordance to the Individuals with Disabilities Education Act (20 U.S.C. 1400 *et seq.*).

*Program uses indicated selection criteria.

Appendix III: Comments From the Department of Education

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF BILINGUAL EDUCATION AND
MINORITY LANGUAGES AFFAIRS

May 8, 2001

Ms. Karen Whiten
Assistant Director,
Education, Workforce,
And Income Security Issues
General Accounting Office
Washington, DC 20548

Dear Ms. Whiten:

Thank you for the opportunity to respond to the GAO draft report entitled -- "Bilingual Education, Four Overlapping Programs Could be Consolidated."

Enclosed is an Addendum that sets out our comments and suggestions on a number of technical matters that we identified in reviewing the draft report. We do, however, have a major substantive concern with the draft that needs to be drawn to your attention. The Department of Education favors consolidation of the four programs examined in this report into a single, State-administered program. The last sentence of the section entitled "Education Officials Believe that the Four Programs Address Two Priorities," -- which begins on page 19 and continues onto page 20, and the final sentence of the section entitled "Conclusions," on page 20, simply do not reflect the Department's policy. Consequently, we recommend that these two sentences be revised so that they accurately reflect this Department's policy in favor of consolidating the four programs into a single State-administered program.

Thank you for an opportunity to comment on the draft report. If you have any further questions, please do not hesitate to contact me.

Sincerely,

Arthur M. Love
Acting Director

Enclosure

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Appendix IV: GAO Contacts and Staff Acknowledgments

GAO Contacts

Karen Whiten, (202) 512-7291
Suzanne Loftjelm, (202) 512-4163

Staff Acknowledgments

In addition to those named above, the following individuals made important contributions to this report: Sherri Doughty, Ellen Habenicht, Corinna Nicolaou, James Rebbe, Jay Smale, and Jim Wright.

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